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9 INGHAM

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ELAINE INGHAM, individually,
Plaintiff,

vs.

ENVIRONMENT CELEBRATION
INSTITUTE, a California Nonprofit;
CAROLE ANN ROLLINS, individually;
and JAMES EDDINGTON, individually,

Defendants.

ENVIRONMENT CELEBRATION
INSTITUTE, a California Nonprofit;
CAROLE ANN ROLLINS, individually;
and JAMES EDDINGTON, individually,

Counter-Complainants,

vs.

ELAINE INGHAM, individually,
Counter-Defendant.

Case No. 4:19-cv-00725-KAW

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO FILE FIRST AMENDED
COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

AS MODIFIED

1 Plaintiff/Counterclaim Defendant Elaine Ingham and Defendants/Counter-Complaints
2 Environment Celebration Institute, Carol Ann Rollins, and James Eddington, by and through their
3 respective counsel, hereby stipulate that Plaintiff/Counterclaim Defendant Elaine Ingham may file her
4 First Amended Complaint for Damages and Injunctive Relief in the form attached as Exhibit A to the
5 Declaration of J. Timothy Nardell In Support of Motion to File First Amended Complaint.

6 Further, Plaintiff/Counterclaim Defendant Elaine Ingham agrees to take her Motion to File First
7 Amended Complaint off calendar when this stipulation is entered.

8 IT IS SO STIPULATED.

9 Dated: June 28, 2019

NARDELL CHITSAZ & ASSOCIATES LLP

10 By: /s/ J. Timothy Nardell

11 J. TIMOTHY NARDELL

12 Attorneys for Plaintiff/Counterclaim Defendant
13 ELAINE INGHAM

14 Dated: June 27, 2019

GREEN & GREEN LAW OFFICES

15 By: /s/ Philip R. Green

16 PHILIP R. GREEN

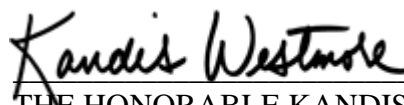
17 Attorneys for Defendants/Counter-Complainants
18 ENVIRONMENT CELEBRATION INSTITUTE,
CAROL ANN ROLLINS, AND
JAMES EDDINGTON

19 **ORDER AS MODIFIED**

20 PURSUANT TO STIPULATION, the stipulation is GRANTED AS MODIFIED. Plaintiff's Motion for
21 Leave to File the First Amended Complaint is TERMINATED as moot. Plaintiff shall file her first
22 amended complaint within 7 days of this order.

23 IT IS SO ORDERED.

24 Dated: July 1, 2019

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26 THE HONORABLE KANDIS A. WESTMORE
27 United States Magistrate Judge
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